

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

DEFENDANT'S
EXHIBIT

A

UNITED STATES OF AMERICA

v.

(Sealed)
CRIMINAL INFORMATION

JOHN DOE, JUVENILE
(See Boyd Malvo)

CASE NUMBER: 02-CR-0474

The United States Attorney charges that:

1) From a time unknown but beginning prior to October 2, 2002 until October 24, 2002, in the District of Maryland and elsewhere, the defendant, JOHN DOE, Juvenile, did knowingly and willfully conspire with JOHN ALLEN MUHAMMAD, a/k/a JOHN WILLIAMS, a/k/a WAYNE WEEKS, a/k/a WAYNE WEEKLEY, to obstruct, delay and affect commerce and the movement of articles and commodities in commerce by extortion, and to commit and threaten physical violence to a person in furtherance of a plan or purpose to do so, in violation of 18 U.S.C. § 1951.

2) From a time unknown but beginning prior to October 2, 2002 until October 24, 2002, in the District of Maryland and elsewhere, the defendant, JOHN DOE, Juvenile, aided and abetted by JOHN ALLEN MUHAMMAD, a/k/a JOHN WILLIAMS, a/k/a WAYNE WEEKS, a/k/a WAYNE WEEKLEY, did knowingly obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce and the movement of articles and commodities in commerce by extortion, and did knowingly commit and threaten physical violence to a person in furtherance of a plan or purpose to do so, in violation of 18 U.S.C. §§ 1951 and 2.

3) From a time unknown but beginning prior to October 2, 2002 until October 24, 2002, in the District of Maryland and elsewhere, the defendant, JOHN DOE, Juvenile, did knowingly and willfully combine, conspire, confederate and agree with JOHN ALLEN MUHAMMAD, a/k/a JOHN WILLIAMS, a/k/a WAYNE WEEKS, a/k/a WAYNE WEEKLEY to travel in interstate commerce with intent to commit crimes of violence, to wit, murders, to further an unlawful activity, to wit, extortion in violation of 18 U.S.C. § 1951, and thereafter to commit crimes of violence to further the unlawful activity, in violation of 18 U.S.C. § 371 and § 1952.

4) On or about October 2, 2002, in the District of Maryland and elsewhere, the defendant, JOHN DOE, Juvenile, aided and abetted by JOHN ALLEN MUHAMMAD, a/k/a JOHN WILLIAMS, a/k/a WAYNE WEEKS, a/k/a WAYNE WEEKLEY, did knowingly travel in interstate commerce from outside the State and District of Maryland to a place within the State and District of Maryland, with intent to commit crimes of violence, to wit, murders, to further an unlawful activity, to wit, extortion in violation of 18 U.S.C. § 1951, and thereafter committed crimes of violence to further the unlawful activity, in violation of 18 U.S.C. §§ 1952 and 2.

5) On or about October 3, 2002, in the District of Maryland and elsewhere, the defendant, JOHN DOE, Juvenile, aided and abetted by JOHN ALLEN MUHAMMAD, a/k/a JOHN WILLIAMS, a/k/a WAYNE WEEKS, a/k/a WAYNE WEEKLEY, did knowingly travel in interstate commerce from the State and District of Maryland to the District of Columbia, with intent to commit crimes of violence, to wit, murders, to further an unlawful activity, to wit, extortion in violation of 18 U.S.C. § 1951, and thereafter committed crimes of violence to further the unlawful activity, in violation of 18 U.S.C. §§ 1952 and 2.

6) On or about October 7, 2002, in the District of Maryland and elsewhere, the defendant, JOHN DOE, Juvenile, aided and abetted by JOHN ALLEN MUHAMMAD, a/k/a JOHN WILLIAMS, a/k/a WAYNE WEEKS, a/k/a WAYNE WEEKLEY, did knowingly travel in interstate commerce from the Commonwealth of Virginia to the State and District of Maryland, with intent to commit crimes of violence, to wit, murders, to further an unlawful activity, to wit, extortion in violation of 18 U.S.C. § 1951, and thereafter committed crimes of violence to further the unlawful activity, in violation of 18 U.S.C. §§ 1952 and 2.

7) On or about October 9, 2002, in the District of Maryland and elsewhere, the defendant, JOHN DOE, Juvenile, aided and abetted by JOHN ALLEN MUHAMMAD, a/k/a JOHN WILLIAMS, a/k/a WAYNE WEEKS, a/k/a WAYNE WEEKLEY, did knowingly travel in interstate commerce from the State and District of Maryland to the Commonwealth of Virginia, with intent to commit crimes of violence, to wit, murders, to further an unlawful activity, to wit, extortion in violation of 18 U.S.C. § 1951, and thereafter committed crimes of violence to further the unlawful activity, in violation of 18 U.S.C. §§ 1952 and 2.

8) On or about October 22, 2002, in the District of Maryland and elsewhere, the defendant, JOHN DOE, Juvenile, aided and abetted by JOHN ALLEN MUHAMMAD, a/k/a JOHN WILLIAMS, a/k/a WAYNE WEEKS, a/k/a WAYNE WEEKLEY, did knowingly travel in interstate commerce from the Commonwealth of Virginia to the State and District of Maryland, with intent to commit crimes of violence, to wit, murders, to further an unlawful activity, to wit, extortion in violation of 18 U.S.C. § 1951, and thereafter committed crimes of violence to further the unlawful activity, in violation of 18 U.S.C. §§ 1952 and 2.

9) On or about October 2, 2002, at approximately 5:20 p.m., in the District of Maryland, the defendant, JOHN DOE, Juvenile, aided and abetted by JOHN ALLEN MUHAMMAD, a/k/a JOHN WILLIAMS, a/k/a WAYNE WEEKS, a/k/a WAYNE WEEKLEY, did knowingly use and discharge a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit, the violations of 18 U.S.C. §§ 371, 1951 and 1952 described in paragraphs 1, 2, 3 and 4 above, in violation of 18 U.S.C. §§ 924(c) and 2.

10) On or about October 2, 2002, at approximately 6:02 p.m., in the District of Maryland, the defendant, JOHN DOE, Juvenile, aided and abetted by JOHN ALLEN MUHAMMAD, a/k/a JOHN WILLIAMS, a/k/a WAYNE WEEKS, a/k/a WAYNE WEEKLEY, did knowingly use and discharge a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of

the United States, to wit, the violations of 18 U.S.C. §§ 371, 1951 and 1952 described in paragraphs 1, 2, 3 and 4 above, in violation of 18 U.S.C. § 924(c), and did, during the course of that violation, cause the death of James D. Martin through the use of the firearm, in violation of 18 U.S.C. §§ 924(j) and 2.

11) On or about October 3, 2002, at approximately 7:41 a.m., in the District of Maryland, the defendant, JOHN DOE, Juvenile, aided and abetted by JOHN ALLEN MUHAMMAD, a/k/a JOHN WILLIAMS, a/k/a WAYNE WEEKS, a/k/a WAYNE WEEKLEY, did knowingly use and discharge a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit, the violations of 18 U.S.C. §§ 371, 1951 and 1952 described in paragraphs 1, 2, 3 and 4 above, in violation of 18 U.S.C. § 924(c), and did, during the course of that violation, cause the death of James Buchanan through the use of the firearm, in violation of 18 U.S.C. §§ 924(j) and 2.

12) On or about October 3, 2002, at approximately 8:12 a.m., in the District of Maryland, the defendant, JOHN DOE, Juvenile, aided and abetted by JOHN ALLEN MUHAMMAD, a/k/a JOHN WILLIAMS, a/k/a WAYNE WEEKS, a/k/a WAYNE WEEKLEY, did knowingly use and discharge a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit, the violations of 18 U.S.C. §§ 371, 1951 and 1952 described in paragraphs 1, 2, 3 and 4 above, in violation of 18 U.S.C. § 924(c), and did, during the course of that violation, cause the death of Premkumar Walekar through the use of the firearm, in violation of 18 U.S.C. §§ 924(j) and 2.

13) On or about October 3, 2002, at approximately 8:37 a.m., in the District of Maryland, the defendant, JOHN DOE, Juvenile, aided and abetted by JOHN ALLEN MUHAMMAD, a/k/a JOHN WILLIAMS, a/k/a WAYNE WEEKS, a/k/a WAYNE WEEKLEY, did knowingly use and discharge a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit, the violations of 18 U.S.C. §§ 371, 1951 and 1952 described in paragraphs 1, 2, 3 and 4 above, in violation of 18 U.S.C. § 924(c), and did, during the course of that violation, cause the death of Sarah Ramos through the use of the firearm, in violation of 18 U.S.C. §§ 924(j) and 2.

14) On or about October 3, 2002, at approximately 9:58 a.m., in the District of Maryland, the defendant, JOHN DOE, Juvenile, aided and abetted by JOHN ALLEN MUHAMMAD, a/k/a JOHN WILLIAMS, a/k/a WAYNE WEEKS, a/k/a WAYNE WEEKLEY, did knowingly use and discharge a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit, the violations of 18 U.S.C. §§ 371, 1951 and 1952 described in paragraphs 1, 2, 3 and 4 above, in violation of 18 U.S.C. § 924(c), and did, during the course of that violation, cause the death of Lori Lewis Rivera through the use of the firearm, in violation of 18 U.S.C. §§ 924(j) and 2.

15) On or about October 3, 2002, at approximately 9:20 p.m., in the District of Maryland and elsewhere, the defendant, JOHN DOE, Juvenile, aided and abetted by JOHN ALLEN

MUHAMMAD, a/k/a JOHN WILLIAMS, a/k/a WAYNE WEEKS, a/k/a WAYNE WEEKLEY, did knowingly use and discharge a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit, the violations of 18 U.S.C. §§ 371, 1951 and 1952 described in paragraphs 1, 2, 3 and 5 above, in violation of 18 U.S.C. § 924(c), and did, during the course of that violation, cause the death of Pascal Charlot through the use of the firearm, in violation of 18 U.S.C. §§ 924(j) and 2.

16) On or about October 4, 2002, at approximately 2:30 p.m., in the District of Maryland and elsewhere, the defendant, JOHN DOE, Juvenile, aided and abetted by JOHN ALLEN MUHAMMAD, a/k/a JOHN WILLIAMS, a/k/a WAYNE WEEKS, a/k/a WAYNE WEEKLEY, did knowingly use and discharge a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit, the violations of 18 U.S.C. §§ 371, 1951 and 1952 described in paragraphs 1, 2, and 3 above, in violation of 18 U.S.C. §§ 924(c) and 2.

17) On or about October 7, 2002, at approximately 8:09 a.m., in the District of Maryland, the defendant, JOHN DOE, Juvenile, aided and abetted by JOHN ALLEN MUHAMMAD, a/k/a JOHN WILLIAMS, a/k/a WAYNE WEEKS, a/k/a WAYNE WEEKLEY, did knowingly use and discharge a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit, the violations of 18 U.S.C. §§ 371, 1951 and 1952 described in paragraphs 1, 2, 3 and 6 above, in violation of 18 U.S.C. §§ 924(c) and 2.

18) On or about October 7, 2002, at approximately 8:09 a.m., in the District of Maryland, the defendant, JOHN DOE, Juvenile, aided and abetted by JOHN ALLEN MUHAMMAD, a/k/a JOHN WILLIAMS, a/k/a WAYNE WEEKS, a/k/a WAYNE WEEKLEY, did knowingly and with reckless disregard for the safety of another, discharge a firearm that had moved in and that otherwise affected interstate commerce at a place that the defendant knew was a school zone, in violation of 18 U.S.C. §§ 922(q)(3)(A) and 2.

19) On or about October 19, 2002, at approximately 7:59 p.m., in the District of Maryland and elsewhere, the defendant, JOHN DOE, Juvenile, aided and abetted by JOHN ALLEN MUHAMMAD, a/k/a JOHN WILLIAMS, a/k/a WAYNE WEEKS, a/k/a WAYNE WEEKLEY, did knowingly use and discharge a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit, the violations of 18 U.S.C. §§ 371, 1951 and 1952 described in paragraphs 1, 2, 3 and 7 above, in violation of 18 U.S.C. §§ 924(c) and 2.

20) On or about October 22, 2002, at approximately 5:56 a.m., in the District of Maryland, the defendant, JOHN DOE, Juvenile, aided and abetted by JOHN ALLEN MUHAMMAD, a/k/a JOHN WILLIAMS, a/k/a WAYNE WEEKS, a/k/a WAYNE WEEKLEY, did knowingly use and discharge a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit, the violations of 18 U.S.C. §§ 371, 1951 and 1952 described in paragraphs 1, 2, 3 and 8 above, in violation of 18 U.S.C. § 924(c), and did, during the course of that

violation, cause the death of Conrad Johnson through the use of the firearm, in violation of 18 U.S.C. §§ 924(j) and 2.

Date

15/ by Tru/
Thomas M. DiBiagio
United States Attorney